

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE,

Plaintiff,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA; and  
individuals TAMIKO STRICKMAN and  
JOHN ROE, individually and in their  
official capacities; and OTHER  
UNIDENTIFIED DEFENDANTS;

Defendants.

Case No. 4:21-cv-03049

**DECLARATION OF LILY AMARE**

I, Lily Amare, make this Declaration in lieu of an affidavit as permitted by 28 U.S.C. § 1746. I am aware that this Declaration will be filed in the United States District Court for the District of Nebraska and that it is the legal equivalent of a statement under oath.

1. I am over the age of 18 and competent in all respects to make this Declaration. The facts contained herein are based upon my personal knowledge.

2. I am an attorney at the law firm Cline Williams Wright Johnson & Oldfather, L.L.P., and counsel for Defendant Board of Regents of the University of Nebraska ("BRUN") and Defendant Tamiko Strickman ("Strickman") (collectively, "Defendants").

3. This Declaration is offered in support of Defendants' Motion for Summary Judgment and in support of their Motion to Exclude Plaintiff's Experts and Strike.

4. Attached hereto as **Exhibit N** is a true and correct copy of excerpts from the transcript of Plaintiff's deposition.

5. Attached hereto as **Exhibit O** is a true and correct copy of Plaintiff's Graduate Admission Application to join a Ph.D. program at Georgia Institute of Technology, which was part of the record received from the subpoena issued upon Georgia Institute of Technology.

6. Attached hereto as **Exhibit P** is a true and correct copy of Plaintiff's Georgia Institute of Technology Transcript, which was part of the record received from subpoena issued upon Georgia Institute of Technology.

7. Attached hereto as **Exhibit Q** is a true and correct copy of Plaintiff's Initial Mandatory Disclosures.

8. Attached hereto as **Exhibit R** is a true and correct copy of Plaintiff's Expert Designation.

9. Attached hereto as **Exhibit S** is a true and correct copy of Lin-Chi Wang's Report, including the documents she attached thereto.

10. Attached hereto as **Exhibit T** is a true and correct copy of excerpts from the deposition transcript of Lin-Chi Wang.

11. Attached hereto as **Exhibit U** is a true and correct copy of Andrew Verzilli's Report.

12. Attached hereto as **Exhibit V** is a true and correct copy of the deposition transcript of Andrew Verzilli.

13. Defendants did not receive any information about or from Dr. Frank Ochberg, other than what is included in Exhibit Q.

14. If called as a witness to testify, I would competently testify to each fact contained in this Declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

*Lily Amare*

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Lily Amare

September 15, 2023

\_\_\_\_\_  
Date

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